

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MINNESOTA

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Aljuan C. Hixon,	)	Case No. 06-Civil 1548 (RHK/JSM)
	)	
Plaintiff,	)	
	)	
v.	)	
	)	<b>PLAINTIFF'S PROPOSED</b>
City of Golden Valley,	)	<b>VOIR DIRE QUESTIONS</b>
Dennis Arons,	)	
Mario Hernandez,	)	
David Kuhnly, and	)	
Christine McCarville,	)	
	)	
Defendants.	)	

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Plaintiff submits the following Proposed Voir Dire Questions:

1. Occupation.
2. Marital Status.
3. Highest grade of education completed.
4. If you attended college, what did you study?
5. Does anyone know any of the named parties or potential testifying experts or witnesses?
6. When you received your notice to appear as a juror, what was your reaction? Positive or negative?
7. Have you, a member of your family circle, or a close friend or significant other ever been convicted of a State or Federal offense other than a minor misdemeanor?
8. Have you, a member of your family circle, or a close friend or significant other ever been a party to a lawsuit? Explain, please.
9. Have you ever testified as a witness in a lawsuit?

10. Have you ever served as a juror before today? If so, please describe the case and the verdict.
11. Have you, a member of your family circle, or a close friend or significant other ever been employed in the medical field? If so, who and what are their occupations?
12. Have you, a member of your family circle, or a close friend or significant other ever been employed in the legal field? If so, who and what are their occupations?
13. Have you, a member of your family circle, or a close friend or significant other ever been employed with the City of Golden Valley? If so, who and what are their occupations?
14. Have you, a member of your family circle, or a close friend or significant other ever had any dealings with the City of Golden Valley or an employee of the City? If so, please describe those circumstances.
15. This is a case where an African-American individual has made allegations of excessive force against a police officer. Does anyone have any immediate reactions or opinions about this?
16. Have you, a member of your family circle, or a close friend or significant other ever been employed as a law enforcement officer? If so, who and what are their occupations?
17. Have you, a member of your family circle, or a close friend or significant other ever served as a judge, lawyer, or prosecutor? If so, please describe their work as it relates to law enforcement.
18. Have you, a member of your family circle, or a close friend or significant other ever had any personal contacts with law enforcement officers? If so, please describe those circumstances. Do you feel you were treated fairly and in a professional manner?
19. Have you, a member of your family circle, or a close friend or significant other ever witnessed an incident you believe constituted an excessive use of force by police?
20. Have you, a member of your family circle, or a close friend or significant other ever witnessed an arrest, other than on a reality television show?

21. Do you believe police officers sometimes abuse their authority and/or violate people's Constitutional rights?
22. Do you believe it is possible that when law enforcement officers have abused their authority, they might lie or remain silent to cover it up?
23. Do you believe police officers should be given more credibility or are entitled to greater believability than ordinary citizens?
24. Have you, a member of your family circle, or a close friend or significant other ever filed a formal or informal complaint against a law enforcement or government official? If so, please describe the circumstances surrounding the complaint.
25. Do you think that police officers are entitled to mete out "street justice" because of failures in our criminal justice system?
26. Do you believe that police officers are required to follow the law, including the Constitution?
27. Have you, a member of your family circle, or a close friend or significant other ever been the victim of a crime?
28. Have you, a member of your family circle, or a close friend or significant other ever been the victim of discrimination? What type of discrimination? Please explain.
29. Do you have any medical, scientific, or healthcare background?
30. Do you believe a psychological injury can be as damaging as a physical one? Why or why not?
31. If you find that Plaintiff was injured in this case, are you comfortable with awarding damages for medical expenses? Pain and suffering?
32. Do you think race or skin color should play any role in our justice system?
33. Do you believe that there are too many lawsuits?
34. Have you heard or read or watched anything about this case or the incident?

35. Can you set aside anything you may have heard and judge this case on the evidence and facts at trial?
36. Do you realize you must follow the judge's instructions in this case, setting aside what you may have learned in the last case?
37. Is there any reason you think you cannot be a fair and impartial juror?
38. Is there any reason why you will not be able to be an attentive and careful juror?

Dated this 17<sup>th</sup> day of August, 2007

Respectfully submitted,

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